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AM Retail Group, Inc. d/b/a DKNY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NANDALYN REYES, an Individual,
Plaintiff,

vs.

AM RETAIL GROUP, INC., dba DKNY; a
Foreign Corporation; DOES 1 Through 25,
inclusive; and ROE CORPORATIONS 1
Through 25, inclusive,
Defendants.

Case No. 2:21-cv-02110-JAD-BNW

**STIPULATION AND ORDER TO
EXTEND THE DISPOSITIVE
MOTION DEADLINE**

(SECOND REQUEST)

Plaintiff Nandalyn Reyes (“Plaintiff”), through her counsel Kang & Associates, PLLC, and Defendant AM Retail Group, Inc. d/b/a DKNY (“Defendant”), through its counsel Jackson Lewis P.C., hereby stipulate and agree to extend the dispositive motion deadline from June 2, 2023, to June 16, 2023.

1. On May 23, 2023, this Court granted Defendant’s Motion to Extend the Dispositive Motion Deadline to June 2, 2023. ECF No. 38.

2. Since the granting of that motion Defendant’s counsel has worked diligently to complete the initial draft.

3. In addition to this matter, undersigned counsel has been required to complete three mediation briefs since May 23, 2023. Further, Mr. Sliker has recently returned from conduct a week-long multi-million dollar arbitration and a week of time out of the office, and has been required to respond to numerous time sensitive matters, including overseeing the return of

misappropriated trade secrets.

4. Despite working over weekends and the recent Memorial Day holiday, counsel will not be able to complete Defendant's Motion for Summary Judgment by the current deadline of June 2, 2023. However, counsel anticipates Defendant's Motion for Summary judgment will be completed on or before June 16, 2023.

5. Accordingly, the parties stipulate and agree that based upon the foregoing, the dispositive motion deadline shall be extended from June 2, 2023, to June 16, 2023. If no dispositive motions are filed, the Joint Pretrial Order shall be filed on June 30, 2023, which is thirty (30) days after the date set for the filing of dispositive motions. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the decision on the dispositive motions or by further order of the Court.

6. The parties submit that these circumstances satisfy the required good cause analysis.

7. This stipulation and order is sought in good faith and not for the purpose of delay.

Dated this 2nd day of June, 2023.

JACKSON LEWIS P.C.

KANG & ASSOCIATES, PLLC

/s/ Katlyn M. Brady

/s/ Kyle R. Tatum

Joshua A. Sliker, Esq.

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Kyle R. Tatum, Esq.

Jackson Lewis, P.C.

Paul H. Wolfram, Esq.

Attorneys for Defendant

Kang & Associates, PLLC

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED:



U.S. Magistrate Judge

Dated: June 5, 2023